

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION**

UNITED STATES OF AMERICA)	
)	
V.)	CASE NOS.: 4:19-CR-00219-3-BRW
)	4:21-CR-00215-1-BRW
CHRISTOPHER DAVID HIGGINS)	

MOTION TO MODIFY ORDER GRANTING TEMPORARY RELEASE

The Defendant, Christopher David Higgins, by and through his counsel, Erin Cassinelli, states in support of his Motion to Modify Order Granting Temporary Release:

1. On August 16, 2022, the Court issued Orders authorizing Defendant's temporary release from custody for attending surgery from Wednesday, October 12, 2022, until his post-operative inpatient discharge from UAMS, but in any event no later than 9:00 p.m. on October 31, 2022, pending further order of the Court. *See* Case No. 4:19-cr-00219-3-BRW at Doc. # 129 ¶¶ 5-6, Case No. 4:21-cr-00215-1-BRW at Doc. # 50 ¶¶ 5-6.

2. Mr. Higgins was able to discharge from UAMS and return to his place of custody, Phillips County Detention Facility, on Wednesday, October 26, 2022. Additionally, Mr. Higgins was able to attend his post-operative appointment on November 3, 2022. However, Dr. Margolick was unable to completely remove the surgical drains and request Mr. Higgins return for a second post-operative appointment to finish the drain removal.

3. Mr. Higgins asks this Court to permit his temporary release on November 17, 2022, so that he can attend his follow up appointment at 9:30 am with Dr. Margolick at the UAMS Outpatient Surgical Clinic, 4110 Outpatient Circle, Little Rock, Arkansas 72205. Clinic staff advised defense counsel that Mr. Higgins will need to arrive at this appointment no later than 9:00 am. Mr. Higgins's family proposes picking him up from Phillips County Jail at 5:30 am and

transporting him to the aforementioned location before returning him to the Phillips County Jail by 3:30 pm that same day.

WHEREFORE, the Defendant, Christopher Higgins, asks the Court to grant his motion, and for any other relief the Court finds appropriate.

Respectfully Submitted,

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